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9 COUNTY OF SANTA CLARA (Erroneously Sued
10 Herein as Santa Clara Valley Medical Center),
11 ANNA HUGHES, and PAUL ESTESS

EO 12812-2

12 CHARLES A. BONNER, ESQ. (S.B. #85413)
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19 Attorneys for Plaintiff
20 HUIMIN SONG

21 UNITED STATES DISTRICT COURT
22 FOR THE NORTHERN DISTRICT OF CALIFORNIA
23 (San Jose Division)

24 HUIMIN SONG,

25 Plaintiff,

26 v.

27 COUNTY OF SANTA CLARA; SANTA
28 CLARA VALLEY MEDICAL CENTER; PAUL
ESTESS, ANNA HUGHES; and Does 1 through
70,

Defendants.

No. CV12-05848 RMW

**STIPULATION AND ORDER TO MODIFY
CASE MANAGEMENT ORDER**

29 In light of the above, the parties stipulate to modify the deadlines in the Court's April
30 15, 2014 Case Management Order as follows:

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<u>Event</u>	<u>Deadline</u>	<u>Proposed Deadline</u>
Fact Discovery Cutoff	December 15, 2014	March 9, 2015
Expert Designation	January 16, 2015	April 10, 2015
Supplemental Expert Designation	February 3, 2015	April 28, 2015
Last Day to hear dispositive motion	March 6, 2015 @ 9:00 a.m.	May 29, 2015 @ 9:00 a.m.
Expert Discovery Cutoff	March 17, 2015	June 9, 2015
Pre-Trial Conference	April 2, 2015 @ 2:00 p.m.	June 25, 2015 @ 2:00 p.m.
Trial Date: 8-Day Jury Trial	April 20, 2015 at 1:30 p.m.	July 42, 2015 @ 1:30 p.m.

The grounds for this stipulation and order are that the parties unsuccessfully attempted to resolve this matter at a settlement conference before Magistrate Nathaniel Cousins on October 30, 2014. On that day, the parties attended a settlement conference on another employment -related lawsuit involving plaintiff Song and Santa Clara County (Huimin Song and An Xie versus Santa Clara County Case No. 11-CV-04450 EJD). Neither matter resolved. The parties have been preparing for trial in the Song and Xie versus Santa Clara County matter. A jury trial in that matter begins in front of Judge Davila on January 13, 2015. The trial is expected to last six court days.

The parties seek a continuance of the trial date for the opportunity to conduct additional discovery and possibly return to mediation to resolve this case, plus several additional pending EEOC claims filed the Plaintiff. The parties feel that it is in the best interest parties and judicial economy for all of Plaintiff's claims to be bundled and mediated so as to obviate the necessity of multiple trials.

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1 The parties have not previously sought to continue the trial date in this matter or move any
2 deadlines after the Court issued its April 15, 2014, case management order.

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5 ORRY P. KORB
COUNTY COUNSEL

6 Dated: 01/09/2015

7 By: /S/

8 MICHAEL C. SERVERIAN
9 Deputy County Counsel

10 Attorneys for County Defendants

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12 LAW OFFICES OF BONNER & BONNER

13 Dated: 01/09/2015

14 By: /S/

15 CHARLES A. BONNER

16 Attorneys for Plaintiff

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19 IT IS SO ORDERED.

20 Dated: Feb 11



21 RONALD M. WHYTE
22 United States District Judge
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